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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CYNTHIA NAPOLITANO,
Plaintiff,

vs.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,
Defendant.

Case No.: 2:17-cv-02286-RFB-VCF

**STIPULATION TO VOLUNTARY REMAND
PURSUANT TO SENTENCE FOUR OF
42 U.S.C. § 405(g) AND TO ENTRY OF
JUDGMENT**

IT IS STIPULATED by and between Plaintiff ("Plaintiff") and Defendant Nancy A. Berryhill, Acting Commissioner of Social Security ("Defendant"), through their undersigned counsel of record, that the above-entitled action shall be remanded to the Commissioner of Social Security for further administrative proceedings.

Upon remand, the Office of Disability Adjudication and Review will remand the case to an Administrative Law Judge (ALJ) and direct him or her to:

(1) Re-evaluate the medical source opinions of John Paglini, Psy.D., Khalid Kamal, M.D., and Mayenne Karelitz, M.D.;

1 (2) Take further action to complete the administrative record resolving the above issues, obtain
2 further vocational expert testimony as necessary, and issue a new decision.

3 This stipulation constitutes a remand under the fourth sentence of Section 205(g) of the Social
4 Security Act, 42 U.S.C. 405(g).

5 Respectfully submitted this 2nd day of May 2018.

6
7 /s/ Michael Rhodes*
8 MICHAEL RHODES
9 Law Office of Michael Rhodes, PLLC
10 Attorney for Plaintiff
11 *Authorized by email on May 2, 2018

12 DAYLE ELIESON
13 United States Attorney

14 /s/ Ellinor R. Coder
15 ELLINOR R. CODER
16 Special Assistant United States Attorney

17 IT IS SO ORDERED:

18 
19 RICHARD F. BOULWARE, II
20 United States District Judge

21 DATED: May 3, 2018.

1 **CERTIFICATE OF SERVICE**

2 I, Ellinor R. Coder, certify that the following individual was served with a copy of the
3 **STIPULATION TO VOLUNTARY REMAND PURSUANT TO SENTENCE FOUR OF**
4 **42 U.S.C. § 405(g) AND TO ENTRY OF JUDGMENT** on the date, and via the method of service,
identified below:

5 **CM/ECF:**

6 Michael Rhodes
7 Law Office of Michael Rhodes, PLLC
8 703 South Eighth Street
9 Las Vegas, NV 89101

10 Dated this 2nd day of May 2018.

11 /s/ Ellinor R. Coder
12 ELLINOR R. CODER
13 Special Assistant United States Attorney
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